



6 May 2024

Stacey Aubrey  
Executive Director  
Insurance Council of Manitoba  
466-167 Lombard Avenue  
Winnipeg, Manitoba R3B 0T6

licensing@icm.mb.ca

Dear Ms. Aubrey,

**Re: Consultation on Council Fees**

The Canadian Association of Direct Relationship Insurers (CADRI) is the voice of insurance enterprises that offer automobile, home, and commercial insurance directly to Canadians. We advocate for flexible and evolving regulatory and legislative frameworks governing automobile, property, and commercial insurance to enable product and service innovation so that Canadians can easily choose insurance that serves their needs through the delivery channels of their choice.

CADRI appreciates the opportunity to comment on the Insurance Council of Manitoba's (the Council's) proposed fee increases for:

- Examination fees,
- General Licence for Individuals and agencies, and
- List of agents.

CADRI understands that the Council is a self-funded agency and that 44% of licence fees, 15% of examination fees, and 100% of disciplinary fines are remitted to the Government of Manitoba on a quarterly basis. In addition, we respect that the Council's fee schedule has remained static for 20 years.

We appreciate that the Council is decreasing the fees for the amendment, transfer, or re-instatement of a licence. That said, the proposed increases to the existing fees will put Manitoba at the upper range of charges from like agencies elsewhere in Canada.

CADRI members would like to better understand the rationale behind these proposed changes and how the increased revenue would support the Council's annual goals. With that information, we may be well placed to assist the Council in exploring other options, including whether a greater proportion of the fees collected should be retained by the agency.

CADRI members are national and international companies who employ licensed agents across Canadian jurisdictions. These agents are often licensed first in their home province; trained to secure licenses in other jurisdictions, and subsequently renew those licenses. Thus, our members incur fees for their agents' application phase in Manitoba, licensing and later annual fees for all the agents serving customers in Manitoba, as well as any eligible agency fees.

Our members serving insurance customers in Manitoba will face increases should these proposals proceed: increases ultimately borne by insurance consumers.

We urge the Council to review its budget and its planned fee increases accordingly.

**Conclusion**

CADRI welcomes the opportunity to comment on the Council's proposed fee changes.

We appreciate the Council's need to be self-financing and that fees have not been increased in 20 years.

Generally, we encourage the Council to be transparent as to the benefit agent and insurer fees contribute to ensuring that those living in Manitoba receive insurance advice from reliable, qualified agents.

We would be pleased to explore our position in further detail and explore other options the Council may be considering.

Yours sincerely,



Geoffrey Beechey  
Chair & CEO  
CADRI

Cc:  
CADRI Board of Directors  
CADRI Licensing Task Force  
CADRI Western Committee